

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

COLBY GOROG, JOSHUA FLINT,  
LOUIS ROBINSON, and MICHAEL LERRO,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

- versus -

ELON MUSK and TESLA, INC.,

Defendants.

**Case No.: 1:22-cv-05037-AKH**

**PLAINTIFF CERTIFICATION  
MICHAEL LERRO**

I, Michael Lerro, do swear under penalty of perjury as follows:

- (i) I am a Plaintiff in this matter. I reviewed and approved the third amended complaint before it was filed.
- (ii) I did not purchase the security that is the subject of the third amended complaint at the direction of Plaintiffs' counsel or in order to participate in any private action arising under this chapter;
- (iii) I understand the duties and responsibilities as a Plaintiff under the Private Securities Litigation Reform Act.
- (iv) I am willing to serve as a representative party on behalf of a class, including providing testimony at deposition and trial, if necessary.
- (v) My Dogecoin transactions are attached hereto as Exhibit "D1."
- (vi) I will not accept any payment for serving as a representative party on behalf of a class beyond the Plaintiffs' pro rata share of any recovery, except as ordered or approved by the Court.
- (vii) I have not sought to serve or served as a representative party for a class in an action under the federal securities laws within the past three years.

I swear or affirm that the foregoing statements made by me are true. I am aware that if same are willfully false, I may be subject to punishment.

SIGNED: /s/ Michael Lerro

DATED: June 7, 2023

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7<sup>th</sup> day of June 2023, a true and correct copy of the above and foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system giving notice to all parties in this action.

s/Evan Spencer

Evan Spencer